

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors.	§	

**DECLARATION OF NINA PERALES**

I, Nina Perales, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Vice President of Litigation of the Mexican American Legal Defense and Educational Fund. I am over the age of 18 and competent to make this declaration.
2. I submit this declaration in support of the Opposition to Plaintiffs' Motion to File a Sur-Reply of Defendant-Intervenors Elizabeth Diaz, et al., filed in the above-referenced case. I am thoroughly familiar with the facts and arguments in this proceeding. I have personal knowledge of the statements contained in this declaration and am fully competent to testify to the matters set forth herein.
3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the motion proceedings for this case held in this Court on December 22, 2020.
4. Attached hereto as Exhibit 2 is a true and correct copy of a June 2018 email exchange between counsel for Plaintiffs, Defendants, and Defendant-Intervenors.

5. Attached hereto as Exhibit 3 is a true and correct copy of *Warrior Energy Servs. Corp. v. ATP Titan M/V* (5th Cir. 2014), which is available at 551 F. App'x 749.

6. Attached hereto as Exhibit 4 is a true and correct copy of *Weems v. Hodnett*, No. 10-CV-1452 (W.D. La. July 13, 2021), which is available at 2011 WL 2731263.

7. Attached hereto as Exhibit 5 is a true and correct copy of *Civelli v. J.P. Morgan Chase Sec., LLC*, C.A. H-173739 (S.D. Tex. Feb. 2, 2023), which is available at 2023 WL 2825702.

8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Second Amended Responses to Defendant-Intervenors' Second Set of Discovery Requests, served on August 7, 2019.

9. Attached hereto as Exhibit 7 is a true and correct copy of *Winfrey v. San Jacinto Cnty.* (5th Cir. 2012), which is available at 481 F. App'x 969.

10. Attached hereto as Exhibit 8 is a true and correct copy of *Wojcik v. Memorial Hermann Health Sys.*, C.A. No. H-17-3198 (S.D. Tex. Oct. 3, 2019), which is available at 2019 WL 4887265.

I verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 20th day of June, 2023.

/s/ Nina Perales  
Nina Perales

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the 20th day of June, 2023, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales